

BWW#:VA-374532

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

IN RE:
JOHN PAUL PELAEZ
Debtor

Case No. 25-10671-KHK
Chapter 13

NOTICE OF MOTION AND NOTICE OF HEARING

U.S. Bank National Association ("Movant"), by and through its counsel, has filed papers with the court to grant relief from the automatic stay and co-debtor stay in the above captioned matter.

NOTICE

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WISH THE COURT TO GRANT THE RELIEF SOUGHT IN THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN WITHIN 14 DAYS FROM THE DATE OF SERVICE OF THIS MOTION, YOU MUST FILE A WRITTEN RESPONSE EXPLAINING YOUR POSITION WITH THE COURT AND SERVE A COPY ON THE MOVANT. UNLESS A WRITTEN RESPONSE IS FILED AND SERVED WITHIN THIS 14-DAY PERIOD, THE COURT MAY DEEM OPPOSITION WAIVED, TREAT THE MOTION AS CONCEDED, AND ISSUE AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT FURTHER NOTICE OR HEARING.

IF YOU MAIL YOUR RESPONSE TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE EXPIRATION OF THE 14- DAY PERIOD (OR 21 DAYS FOR CO-DEBTOR).

Barry Spear, Esq., VSB# 39152
8100 Three Chopt Road, Suite 240
Richmond, VA 23229
(804) 282-0463
Counsel for the Movant

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before December 1, 2025 (or December 8, 2025 if you are the co-debtor), you or your attorney must:

- File with the court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

The address of the clerk's office is as follows:

Clerk of Court
United States Bankruptcy Court
200 S. Washington Street
Alexandria, Virginia 22314

You must **also** mail a copy to the persons listed below.

- Attend the hearing on the motion scheduled to be held on December 18, 2025, at 11:00 AM at U.S. Bankruptcy Court, 200 S. Washington St., Courtroom III, Alexandria, Virginia 22314-5405. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- A copy of any written response must be mailed to the following persons:

Barry Spear, Esq.
8100 Three Chopt Road, Suite 240
Richmond, VA 23229

Thomas P. Gorman, Chapter 13 Trustee
1414 Prince St., Ste. 202
Alexandria, VA 22314

Daniel M. Press, Esq.
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101

John Paul Pelaez
13631 Dulles Technology Dr
Herndon, VA 20171

Nancy Thu Hien Ho
13631 Dulles Technology Dr
Herndon, VA 20171

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Respectfully Submitted,

Dated: November 17, 2025

____/s/ Barry Spear_____
Barry Spear, Esq., VSB# 39152
BWW Law Group, LLC
8100 Three Chopt Rd.
Suite 240
Richmond, VA 23229
(804) 282-0463 (phone)
(804) 282-0541 (facsimile)
bankruptcy@bww-law.com
Counsel for the Movant

CERTIFICATION

I hereby certify that on this 17th day of November, 2025, the following person(s) were or will be served with a copy of the foregoing Notice of Motion and Notice of Hearing via the CM/ECF system or by first class mail, postage prepaid:

Thomas P. Gorman, Trustee
1414 Prince St. Ste. 202
Alexandria, VA 22314

John Paul Pelaez
13631 Dulles Technology Dr
Herndon, VA 20171

Nancy Thu Hien Ho
13631 Dulles Technology Drive
Herndon, VA 20171

_____/s/ Barry Spear_____
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